

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

ALVIN BALDUS, CINDY BARBERA, CARLENE
BECHEN, RONALD BIENDSEIL, RON BOONE, VERA
BOONE, ELVIRA BUMPUS, EVANJELINA
CLEEREMAN, SHEILA COCHRAN, LESLIE W.
DAVIS III, BRETT ECKSTEIN, MAXINE HOUGH,
CLARENCE JOHNSON, RICHARD KRESBACH,
RICHARD LANGE, GLADYS MANZANET,
ROCHELLE MOORE, AMY RISSEEUW, JUDY
ROBSON, GLORIA ROGERS, JEANNE SANCHEZ-
BELL, CECELIA SCHLIEPP, TRAVIS THYSSEN,

Plaintiffs,

TAMMY BALDWIN, GWENDOLYNNE MOORE
and RONALD KIND,

Intervenor-Plaintiffs,

v.

Members of the Wisconsin Government Accountability
Board, each only in his official capacity:
MICHAEL BRENNAN, DAVID DEININGER, GERALD
NICHOL, THOMAS CANE, THOMAS BARLAND, and
TIMOTHY VOCKE, and KEVIN KENNEDY, Director
and General Counsel for the Wisconsin Government
Accountability Board,

Defendants,

F. JAMES SENSENBRENNER, JR., THOMAS E. PETRI,
PAUL D. RYAN, JR., REID J. RIBBLE,
and SEAN P. DUFFY,

Intervenor-Defendants.

(caption continued on next page)

Civil Action
File No. 11-CV-562

Three-judge panel
28 U.S.C. § 2284

**DECLARATION OF PETER G. EARLE
IN SUPPORT OF THE BALDUS AND VOCES DE LA FRONTERA PLAINTIFFS'
PROPOSED REMEDY FOR VOTING RIGHTS ACT VIOLATION**

VOCES DE LA FRONTERA, INC., RAMIRO VARA,
OLGA WARA, JOSE PEREZ, and ERICA RAMIREZ,

Plaintiffs,

v.

Case No. 11-CV-1011
JPS-DPW-RMD

Members of the Wisconsin Government Accountability
Board, each only in his official capacity:
MICHAEL BRENNAN, DAVID DEININGER, GERALD
NICHOL, THOMAS CANE, THOMAS BARLAND, and
TIMOTHY VOCKE, and KEVIN KENNEDY, Director
and General Counsel for the Wisconsin Government
Accountability Board,

Defendants.

I, Peter G. Earle, declare, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that
the following is true and correct:

1. I am an attorney with the Law Office of Peter Earle, LLC, and I am admitted to
practice in the State of Wisconsin and in the U.S. District Court for the Eastern District of
Wisconsin. I represent the Voces de la Frontera plaintiffs in the above-captioned matter. I make
this declaration based on my personal knowledge and in support of the Joint Brief of Baldus and
Voces de la Frontera Plaintiffs in Support of Proposed Remedy for Voting Rights Act Violation.

2. Following this Court's March 27, 2012 Order (Dkt. 218), I asked plaintiffs'
expert, Dr. Ken Mayer, to develop a series of alternative proposals for the configuration of
Assembly Districts 8 and 9 responsive to this Court's rulings.

3. Between March 27 and 30, I met individually with six members of the Latino
community in Milwaukee to discuss possible configurations for District 8. Between April 1 and
3, my co-counsel Jacqueline Boynton met with eight members of the Latino community of
Milwaukee to discuss possible configurations for District 8. Each of these 14 individuals signed

a declaration recounting the substance of these meetings and their endorsement of the proposed map that plaintiffs submit today.

4. On March 27, 2012, I met with Jocasta Zamarripa, the incumbent Representative for Assembly District 8, to discuss possible configurations for District 8. A true and correct copy of Representative Zamarripa's declaration is attached as **Exhibit A**.

5. On March 27, 2012, I met with Christine Neumann-Ortiz, the Executive Director of Voces de la Frontera, Inc., to discuss possible configurations for Assembly District 8. A true and correct copy of Ms. Neumann-Ortiz's declaration is attached as **Exhibit B**.

6. On March 27, 2012, I met with Maria Monreal-Cameron, the President and CEO of the Hispanic Chamber of Commerce of Wisconsin, to discuss possible configurations for Assembly District 8. A true and correct copy of Ms. Monreal-Cameron's declaration is attached as **Exhibit C**.

7. On March 27, 2012, I met with Juan Carlos Ruiz, the Coordinator for the Milwaukee Latino Redistricting Committee, to discuss possible configurations for Assembly District 8. A true and correct copy of Mr. Ruiz's declaration is attached as **Exhibit D**.

8. On March 28, 2012, I met with Victor Huyke, the publisher of the Latino newspaper, *El Conquistador*, to discuss possible configurations for Assembly District 8. A true and correct copy of Mr. Huyke's declaration is attached as **Exhibit E**.

9. On March 30, 2012, I met with Darryl Morin, the former President of the Wisconsin League of United Latin American Citizens (LULAC), to discuss possible configurations for Assembly District 8. A true and correct copy of Mr. Morin's declaration is attached as **Exhibit F**.

10. On April 1, 2012, Jacqueline Boynton met with Steve Fendt, the Executive Director of the Southside Organizing Committee, to discuss possible configurations for

Assembly District 8. A true and correct copy of Mr. Fendt's declaration is attached as **Exhibit G.**

11. On April 2, 2012, Jacqueline Boynton met with Dr. Luis "Tony" Baez, the Executive Director of The Spanish Center, to discuss possible configurations for Assembly District 8. A true and correct copy of Dr. Baez's declaration is attached as **Exhibit H.**

12. On April 2, 2012, Jacqueline Boynton met with Ernesto Chacon, the former Deputy Director for Governor Doyle's Milwaukee office, to discuss possible configurations for Assembly District 8. A true and correct copy of Mr. Chacon's declaration is attached as **Exhibit I.**

13. On April 2, 2012, Jacqueline Boynton met with Enrique E. Figueroa, Ph.D., the Director of the Roberto Hernandez Center at UW-Milwaukee, to discuss possible configurations for Assembly District 8. A true and correct copy of Dr. Figueroa's declaration is attached as **Exhibit J.**

14. On April 2, 2012, Jacqueline Boynton met with Jose G. Perez, a real estate developer and candidate for the 12th Aldermanic District seat on the Milwaukee Common Council, to discuss possible configurations for Assembly District 8. A true and correct copy of Mr. Perez's declaration is attached as **Exhibit K.**

15. On April 2, 2012, Jacqueline Boynton met with Jesus Salas, a former Regent for the University of Wisconsin system, to discuss possible configurations for Assembly District 8. A true and correct copy of Mr. Salas's declaration is attached as **Exhibit L.**

16. On April 2, 2012, Jacqueline Boynton met with Ernesto Villareal, the owner of Supermercado El Rey, to discuss possible configurations for Assembly District 8. A true and correct copy of Mr. Villareal's declaration is attached as **Exhibit M.**

17. On April 3, 2012, Jacqueline Boynton met with John Bartkowski, the Executive Director of the Sixteenth Street Community Health Center, to discuss possible configurations for Assembly District 8. A true and correct copy of Mr. Bartkowski's declaration is attached as **Exhibit N.**

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 3, 2012.

s/ Peter G. Earle
Peter G. Earle
State Bar No. 1012176
839 North Jefferson Street, Suite 300
Milwaukee, WI 53202
414-276-1076
peter@earle-law.com

7720821_1

EXHIBIT A

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ALVIN BALDUS, et. al.,

Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,

Defendants.

VOCES DE LA FRONTERA, INC., et. al.,

Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,

Defendants.

DECLARATION

JOCASTA ZAMARRIPA, under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am the Representative for the 8th Assembly District in Wisconsin.
2. On March 27, 2012, I met with Attorney Peter Earle to discuss possible configurations for redrawing the 8th Assembly District in order to remedy the Court Order issued on March 22, 2012.
3. During the meeting I reviewed various potential configurations for Assembly District 8.

4. During the meeting Mr. Earle and I discussed the scope of the Decision and Order of the Court in determining how each of the configurations related to the Order.
5. We also discussed the importance of achieving the highest possible percentage of Hispanic citizens of voting age while simultaneously retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District.
6. After due deliberation and consultation I have determined that a map that retains at least a Latino *effective* voting majority of 55% (citizens of voting age) while retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District is in the best interests of the community as a whole.
7. It is my belief and opinion that the interests of the Latino community are best served by the configuration and boundaries of the map proposed by Voces de la Frontera, Inc. for the 8th Assembly District.

Dated: March 31, 2012

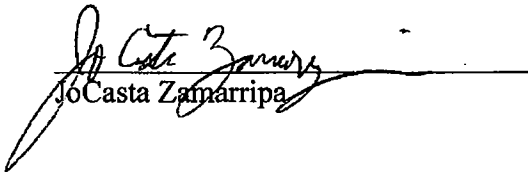

JoCasta Zamarripa

EXHIBIT B

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ALVIN BALDUS, et. al.,

Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,

Defendants.

VOCES DE LA FRONTERA, INC., et. al.,

Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,

Defendants.

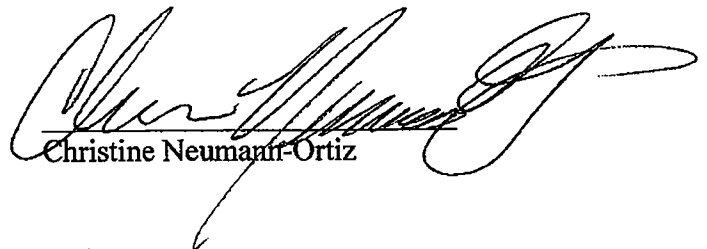
DECLARATION

Christine Neumann-Ortiz, under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am the Executive Director of Voces de la Frontera, Inc. and our office is at 1027 S. 5th Street, said office being located in the 8th Assembly District.
2. On March 27, 2012, I met with Attorney Peter Earle to discuss possible configurations for redrawing the 8th Assembly District in order to remedy the Court issued on March 22, 2012.
3. During the meeting I reviewed various potential configurations for Assembly District 8.

4. During the meeting Attorney Earle and I discussed the scope of the Decision and Order of the Court in determining how each of the configurations related to the Order.
5. We also discussed the importance of achieving the highest possible percentage of Hispanic citizens of voting age while simultaneously retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District.
6. After due deliberation and consultation I have determined that a map that retains at least a Latino *effective* voting majority of 55% (citizens of voting age) while retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District is in the best interests of the community as a whole.
7. It is my belief and opinion that the interests of the Latino community are best served by the configuration and boundaries of the map proposed by Voces de la Frontera, Inc. for the 8th Assembly District.

Dated: April 2, 2012



Christine Neuman-Ortiz

EXHIBIT C

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ALVIN BALDUS, et. al.,

Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,

Defendants.

VOCES DE LA FRONTERA, INC., et. al.,

Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,

Defendants.

DECLARATION

Maria Monreal-Cameron, under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am the President & CEO of the Hispanic Chamber of Commerce of Wisconsin and our office is at 1021 West National Avenue, Milwaukee, Wisconsin, said offices being located in the 8th Assembly District.
2. On March 27, 2012, I met with Attorney Peter Earle to discuss possible configurations for redrawing the 8th Assembly District in order to remedy the Court issued on March 22, 2012.

3. During the meeting I reviewed various potential configurations for Assembly District 8.
4. During the meeting Attorney Earle and I discussed the scope of the Decision and Order of the Court in determining how each of the configurations related to the Order.
5. We also discussed the importance of achieving the highest possible percentage of Hispanic citizens of voting age while simultaneously retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District.
6. After due deliberation and consultation I have determined that a map that retains at least a Latino *effective* voting majority of 55% (citizens of voting age) while retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District is in the best interests of the community as a whole.
7. It is my belief and opinion that the interests of the Latino community are best served by the configuration and boundaries of the map proposed by Voices de la Frontera for the 8th Assembly District.

Dated: April 2, 2012



Maria Monreal-Cameron

EXHIBIT D

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ALVIN BALDUS, et. al.,

Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,

Defendants.

VOCES DE LA FRONTERA, INC., et. al.,

Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,

Defendants.

DECLARATION

Juan Carlos Ruiz, under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am the Coordinator for the Milwaukee Latino Redistricting Committee whose coalition partners include: Education Policy and Community Studies at UW-Milwaukee, Hispanic Chamber of Commerce of WI, Hispanic Entrepreneurs of WI, Latino Student Organization of MATC, LULAC of Wisconsin, Mexican Fiesta, Milwaukee Latino Health Coalition, Rotary Club Amigos de Milwaukee, Voces de la Frontera, Inc., WI Latino Action Coalition and Youth Empowered in the Struggle.
2. Our mission is to work for redistricting that is fair to the Latino and minority communities in Milwaukee and Wisconsin.

3. On March 27, 2012, I met with Attorney Peter Earle to discuss possible configurations for redrawing the 8th Assembly District in order to remedy the Court Order issued on March 22, 2012.
4. During the meeting I reviewed various potential configurations for Assembly District 8.
5. During the meeting Mr. Earle and I discussed the scope of the Decision and Order of the Court in determining how each of the configurations related to the Order.
6. We also discussed the importance of achieving the highest possible percentage of Hispanic citizens of voting age while simultaneously retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District.
7. After due deliberation and consultation I have determined that a map that retains at least a Latino *effective* voting majority of 55% (citizens of voting age) while retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District is in the best interests of the community as a whole.
8. It is my belief and opinion that the interests of the Latino community are best served by the configuration and boundaries of the map proposed by Voces de la Frontera, Inc. for the 8th Assembly District.

Dated: April 1, 2012

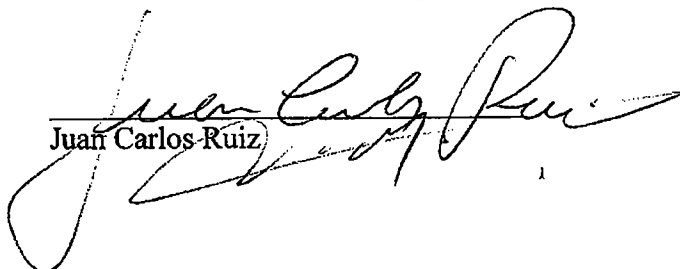

Juan Carlos Ruiz

EXHIBIT E

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ALVIN BALDUS, et. al.,

Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,

Defendants.

VOCES DE LA FRONTERA, INC., et. al.,

Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,

Defendants.

DECLARATION

VICTOR HUYKE, under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am the publisher of the Latino newspaper, El Conquistador, a weekly bilingual newspaper circulated in Milwaukee, Racine, Kenosha and Waukesha.
2. On March 28, 2012, I met with Attorney Peter Earle to discuss possible configurations for redrawing the 8th Assembly District in order to remedy the Court Order issued on March 22, 2012.
3. During the meeting I reviewed various potential configurations for Assembly District 8.

4. During the meeting Mr. Earle and I discussed the scope of the Decision and Order of the Court in determining how each of the configurations related to the Order.
5. We also discussed the importance of achieving the highest possible percentage of Hispanic citizens of voting age while simultaneously retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District.
6. After due deliberation and consultation I have determined that a map that retains at least a Latino effective voting majority of 55% (citizens of voting age) while retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District is in the best interests of the community as a whole.
7. It is my belief and opinion that the interests of the Latino community may be best served by the configuration and boundaries of the map proposed by Voces de la Frontera, Inc. for the 8th Assembly District.
8. However, I do reserve the right to accept and support another map, should I feel that said map is more in line with what I feel would best represent the growth of the Latino Community.

Dated: April 2, 2012



Victor Hayke

EXHIBIT F

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ALVIN BALDUS, et. al.,

Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,

Defendants.

VOCES DE LA FRONTERA, INC., et. al.,

Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,

Defendants.

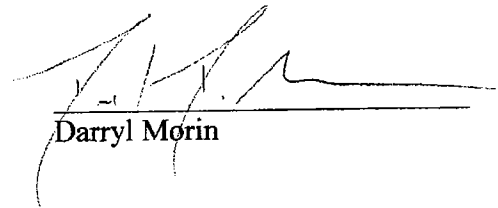
DECLARATION

Darryl Morin, under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am the former President of the Wisconsin League of United Latin American Citizens (LULAC), an organization dedicated to advancing the economic, educational, political and civil rights of the Hispanic population in Wisconsin.
2. I am also the Chair of the Latino Redistricting Committee.
3. On March 30, 2012, I met with Attorney Peter Earle to discuss possible configurations for redrawing the 8th Assembly District in order to remedy the Court Order issued on March 22, 2012.

4. During the meeting I reviewed various potential configurations for Assembly District 8.
5. During the meeting Mr. Earle and I discussed the scope of the Decision and Order of the Court in determining how each of the configurations related to the Order.
6. We also discussed the importance of achieving the highest possible percentage of Hispanic citizens of voting age while simultaneously retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District.
7. After due deliberation and consultation I have determined that a map that retains at least a Latino *effective* voting majority of 55% (citizens of voting age) while retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District is in the best interests of the community as a whole.
8. It is my belief and opinion that the interests of the Latino community are best served by the configuration and boundaries of the map proposed by Voces de la Frontera, Inc. for the 8th Assembly District.

Dated: April 3, 2012



Darryl Morin

Joint Plaintiffs Proposed Remedy

The map displays two specific areas highlighted with their respective statistics:

- Area 8:**
 - Pop.: 57,196
 - Dev.: -0.43%
 - HCVAP: 67.68%
 - Core Retn.: 75.84%
- Area 9:**
 - Pop.: 57,283
 - Dev.: -0.28%
 - HVAP: 47.52%
 - HCVAP: 34.78%
 - Core Retn.: 69.19%

The map includes major roads such as I-94, I-49, State Hwy 59, State Hwy 24, State Hwy 32, State Hwy 36, State Hwy 41, and State Hwy 119. It also shows numerous local streets and highways like W Loomis Rd, W Coldspring Rd, W Bottsford Ave, W Colony Dr, W Layton Ave, W Barnard Ave, W Holmes Ave, W Vogel Ave, Canterbury Rd, W Abbott Ave, W Clayton Crest Ave, W Upham Ave, W Edgerton Ave, W Foster Ave, W Van Norman Ave, W Whitaker Ave, W Sonata Dr, W Plainfield Ave, W Bolivar Ave, W Crawford Ave, W Wilbur Ave, W Morgan Ave, W Holt Ave, W Euclid Ave, W Ohio Ave, W Oklahoma Pl, W Saveland Ave, W Tripoli Ave, W Norwich St, E Waterford Ave, E Bolivar Ave, E Armour Ave, E Layton Ave, E Joseph M Hutsteiner Dr, and State Hwy 119.

72

EXHIBIT G

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ALVIN BALDUS, et. al.,

Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,

Defendants.

VOCES DE LA FRONTERA, INC., et. al.,

Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,

Defendants.

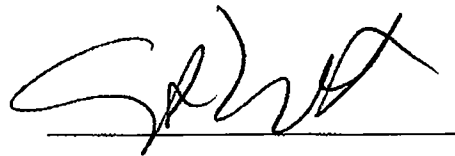
DECLARATION

STEVE FENDT, under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am the Executive Director of the Southside Organizing Committee at 1300 S. Layton Boulevard, Milwaukee.
2. We are a neighborhood-based organization dedicated to the development of Milwaukee's near South Side neighborhoods. Much of our work happens within the 8th Assembly District.
3. On April 1, 2012, I met with Attorney Jacqueline Boynton to discuss possible configurations for redrawing the 8th Assembly District in order to remedy the Court Order issued on March 22, 2012.

4. During the meeting I reviewed various potential configurations for Assembly District 8.
5. During the meeting Attorney Boynton and I discussed the scope of the Decision and Order of the Court in determining how each of the configurations related to the Order.
6. We also discussed the importance of achieving the highest possible percentage of near south side citizens of voting age and keeping the District compact and maintaining the community of interest.
7. After due deliberation and consultation I have determined that the Joint Plaintiff's proposed map satisfies the Voting Rights Act and maintains the community of interest of the near south side.

Dated: April 1, 2012

A handwritten signature in black ink, appearing to read 'Steve Fendt', is written over a horizontal line.

Steve Fendt

EXHIBIT H

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ALVIN BALDUS, et. al.,

Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,

Defendants.

VOCES DE LA FRONTERA, INC., et. al.,

Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,

Defendants.

DECLARATION

Dr. Luis “Tony” Baez, under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am the Executive Director of The Spanish Center located at 614 West National Avenue located in the 8th Assembly District.
2. We are a Latino community-based organization that offers educational programs and social services to the area encompassed by the proposed Joint Plaintiff’s Map for the 8th Assembly District.

3. On April 2, 2012, I met with Attorney Jacqueline Boynton to discuss possible configurations for redrawing the 8th Assembly District in order to remedy the Court Order issued on March 22, 2012.
4. During the meeting I reviewed various potential configurations for Assembly District 8.
5. During the meeting Attorney Boynton and I discussed the scope of the Decision and Order of the Court in determining how each of the configurations related to the Order.
6. We also discussed the importance of achieving the highest possible percentage of Hispanic citizens of voting age while simultaneously retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District.
7. After due deliberation and consultation I have determined that a map that retains at least a Latino *effective* voting majority of 55% (citizens of voting age) while retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District is in the best interests of The Spanish Center and the community as a whole.
8. It is my belief and opinion that the interests of the Latino community are best served by the configuration and boundaries of the map proposed by Voces de la Frontera, Inc. for the 8th Assembly District.

Dated: April 2, 2012

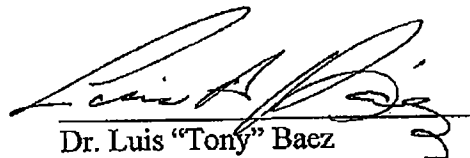

Dr. Luis "Tony" Baez

EXHIBIT I

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ALVIN BALDUS, et. al.,

Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,

Defendants.

VOCES DE LA FRONTERA, INC., et. al.,

Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,

Defendants.

DECLARATION

Ernesto Chacon, under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am the former Deputy Director for Governor Jim Doyle's Milwaukee office and a long-time activist in the Latino community and a resident of the near south side.
2. On April 2, 2012, I met with Attorney Jacqueline Boynton to discuss possible configurations for redrawing the 8th Assembly District in order to remedy the Court issued on March 22, 2012.
3. During the meeting I reviewed various potential configurations for Assembly District 8.

4. During the meeting Attorney Boynton and I discussed the scope of the Decision and Order of the Court in determining how each of the configurations related to the Order.
5. We also discussed the importance of achieving the highest possible percentage of Hispanic citizens of voting age while simultaneously retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District.
6. After due deliberation and consultation I have determined that a map that retains at least a Latino *effective* voting majority of 55% (citizens of voting age) while retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District is in the best interests of the community as a whole.
7. It is my belief and opinion that the interests of the Latino community are best served by the configuration and boundaries of the map proposed by Voces de la Frontera, Inc. for the 8th Assembly District.

Dated: April 2, 2012

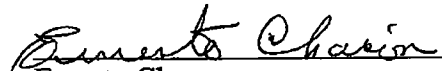

Ernesto Chacon

EXHIBIT J

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ALVIN BALDUS, et. al.,

Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,

Defendants.

VOCES DE LA FRONTERA, INC., et. al.,

Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,

Defendants.

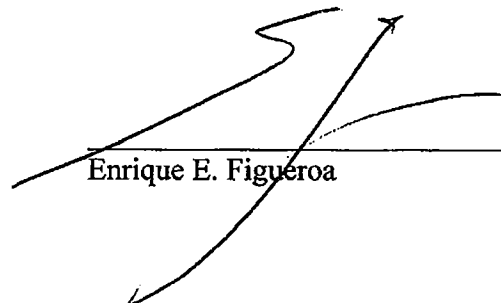
DECLARATION

Enrique E. Figueroa, Ph.D., under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am the Director of the Roberto Hernandez Center at UW- Milwaukee and our mission is to provide information, resources and opportunities pertinent to the Latino community in southeastern Wisconsin- especially to Latino students at UW- Milwaukee.
2. On April 2, 2012, I met with Attorney Jacqueline Boynton to discuss possible configurations for redrawing the 8th Assembly District in order to remedy the Court Order issued on March 22, 2012.

3. During the meeting I reviewed various potential configurations for Assembly District 8.
4. During the meeting Ms. Boynton and I discussed the scope of the Decision and Order of the Court in determining how each of the configurations related to the Order.
5. We also discussed the importance of achieving the highest possible percentage of Hispanic citizens of voting age while simultaneously retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District.
6. After due deliberation and consultation I have determined that a map that retains at least a Latino *effective* voting majority of 55% (citizens of voting age) while retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District is in the best interests of the community as a whole.
7. It is my belief and opinion that the interests of the Latino community are best served by the configuration and boundaries of the map proposed by Voces de la Frontera, Inc. for the 8th Assembly District.

Dated: April 2, 2012



Enrique E. Figueroa

EXHIBIT K

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ALVIN BALDUS, et. al.,

Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,

Defendants.

VOCES DE LA FRONTERA, INC., et. al.,

Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,

Defendants.

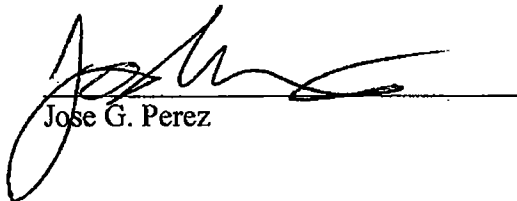
DECLARATION

JOSE G. PEREZ, under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am a candidate for the 12th Aldermanic District seat on the Milwaukee Common Council. Much of that district is within the proposed Plaintiff's Joint Map for the 8th Assembly District.
2. I am a real estate developer and am involved in economic development in Milwaukee's near south side, including the area that is within the proposed Plaintiff's Joint Map for the 8th Assembly District.
3. On April 2, 2012, I met with Attorney Jacqueline Boynton to discuss possible configurations for redrawing the 8th Assembly District in order to remedy the Court Order issued on March 22, 2012.

4. During the meeting I reviewed various potential configurations for Assembly District 8.
5. During the meeting Attorney Boynton and I discussed the scope of the Decision and Order of the Court in determining how each of the configurations related to the Order.
6. We also discussed the importance of achieving the highest possible percentage of Hispanic citizens of voting age while simultaneously retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District.
7. After due deliberation and consultation I have determined that a map that retains at least a Latino *effective* voting majority of 55% (citizens of voting age) while retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District is in the best interests of the community as a whole.
8. It is my belief and opinion that the interests of the Latino community are best served by the configuration and boundaries of the map proposed by Voces de la Frontera, Inc. for the 8th Assembly District.

Dated: April 02, 2012



Jose G. Perez

EXHIBIT L

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ALVIN BALDUS, et. al.,

Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,

Defendants.

VOCES DE LA FRONTERA, INC., et. al.,

Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,

Defendants.

DECLARATION

Jesus Salas, under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am a former Regent for the University of Wisconsin system and a civil rights leader in the Latino community and the Wisconsin Farmworkers movement.
2. On April 2, 2012, I met with Attorney Jacqueline Boynton to discuss possible configurations for redrawing the 8th Assembly District in order to remedy the Court issued on March 22, 2012.
3. During the meeting I reviewed various potential configurations for Assembly District 8.

4. During the meeting Attorney Boynton and I discussed the scope of the Decision and Order of the Court in determining how each of the configurations related to the Order.
5. We also discussed the importance of achieving the highest possible percentage of Hispanic citizens of voting age while simultaneously retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District.
6. After due deliberation and consultation I have determined that a map that retains at least a Latino *effective* voting majority of 55% (citizens of voting age) while retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District is in the best interests of the community as a whole.
7. It is my belief and opinion that the interests of the Latino community are best served by the configuration and boundaries of the map proposed by Voces de la Frontera, Inc. for the 8th Assembly District.

Dated: April 02 2012

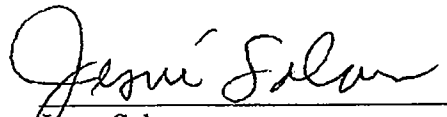

Jesus Salas

EXHIBIT M

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ALVIN BALDUS, et. al.,
Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,
Defendants.

VOCES DE LA FRONTERA, INC., et. al.,
Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,
Defendants.

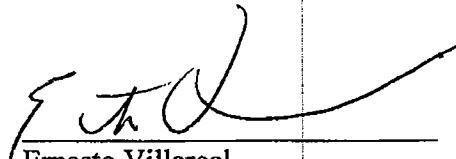
DECLARATION

ERNESTO VILLAREAL, under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am the owner of Supermercado El Rey, Milwaukee's only authentic Hispanic grocery stores.
2. Our flagship store is at 916 S. Cesar E. Chavez Drive located in the 8th Assembly District.
3. On April 2, 2012, I discussed the redistricting maps with Attorney Jacqueline Boynton and the possible configurations for redrawing the 8th Assembly District in order to remedy the Court Order issued on March 22, 2012.
4. During the discussion I reviewed various potential configurations for Assembly District 8 including Joint Plaintiff's Map.
5. Attorney Boynton and I discussed the scope of the Decision and Order of the Court in determining how the configurations related to the Order.

6. We also discussed the importance of achieving the highest possible percentage of Hispanic citizens of voting age while simultaneously retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District.
7. After due deliberation and consultation I have determined that the Joint Plaintiff's Map that retains at least a Latino *effective* voting majority of 55% (citizens of voting age) and maintains the 16th Street corridor within the District 8 while retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District is in the best interests of Supermercado El Rey and the community as a whole.
8. It is my belief and opinion that the interests of the Latino community are best served by the configuration and boundaries of the map proposed by Voces de la Frontera, Inc. for the 8th Assembly District.

Dated: April 2, 2012



Ernesto Villareal

EXHIBIT N

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ALVIN BALDUS, et. al.,

Plaintiffs,

vs.

Case No.: 11-C-562

MICHAEL BRENNAN, et. al.,

Defendants.

VOCES DE LA FRONTERA, INC., et. al.,

Plaintiffs,

vs.

Case No.: 11-C-1011

MICHAEL BRENNAN, et. al.,

Defendants.

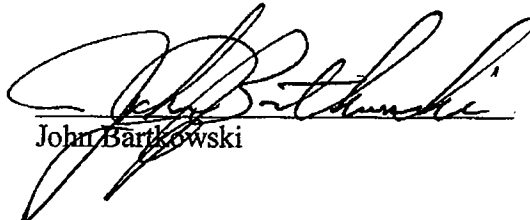
DECLARATION

JOHN BARTKOWSKI, under penalty of perjury, states, based on personal knowledge, that the following facts are true and correct:

1. I am the Executive Director of the Sixteenth Community Health Center.
2. Our main clinic is located at 1032 S. Cesar E. Chavez Drive and the Administrative offices and WIC Nutrition Program are located at 1337 S. Cesar Chavez Drive. Both locations would be in the 8th Assembly District as proposed by the Plaintiff's Joint Map.
3. Sixteenth Street Community Health Centers provides high quality health care, health education and social services to low-income residents of Milwaukee's culturally diverse south side.

4. On April 3, 2012, I met with Attorney Jacqueline Boynton to discuss possible configurations for redrawing the 8th Assembly District in order to remedy the Court Order issued on March 22, 2012.
5. During the meeting I reviewed various potential configurations for Assembly District 8.
6. During the meeting Attorney Boynton and I discussed the scope of the Decision and Order of the Court in determining how each of the configurations related to the Order.
7. We also discussed the importance of achieving the highest possible percentage of Hispanic citizens of voting age while simultaneously retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District.
8. After due deliberation and consultation I have determined that a map that retains at least a Latino *effective* voting majority of 55% (citizens of voting age) while retaining the Walker's Point community and business development corridor along South First and South Second Streets within the 8th Assembly District is in the best interests of the community as a whole.
9. It is my belief and opinion that the interests of the Latino community are best served by the configuration and boundaries of the map proposed by Voces de la Frontera, Inc. for the 8th Assembly District.

Dated: April 3, 2012


John Bartkowski

Brandt, Karen J (15243)

From: ecfmaster@wied.uscourts.gov
Sent: Tuesday, April 03, 2012 6:19 PM
To: ecfmaster@wied.uscourts.gov
Subject: Activity in Case 2:11-cv-00562-JPS-DPW-RMD Baldus et al v. Brennan et al Declaration

This is an automatic e-mail message generated by the CM/ECF system. Please **DO NOT RESPOND** to this e-mail because the mail box is unattended.

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

United States District Court

Eastern District of Wisconsin

Notice of Electronic Filing

The following transaction was entered by Earle, Peter on 4/3/2012 at 6:19 PM CDT and filed on 4/3/2012

Case Name: Baldus et al v. Brennan et al

Case Number: 2:11-cv-00562-JPS-DPW-RMD

Filer:

WARNING: CASE CLOSED on 03/22/2012

Document Number: 225

Docket Text:

DECLARATION of Peter G. Earle *in Support of Plaintiffs' Proposed Remedy for Voting Rights Act Violation*. (Attachments: # (1) Exhibit A: Declaration of Jocasta Zamarripa, # (2) Exhibit B: Declaration of Christine Neumann-Ortiz, # (3) Exhibit C: Declaration of Maria Monreal-Cameron, # (4) Exhibit D: Declaration of Juan Carlos Ruiz, # (5) Exhibit E: Declaration of Victor Huyke, # (6) Exhibit F: Declaration of Darryl Morin, # (7) Exhibit G: Declaration of Steve Fendt, # (8) Exhibit H: Declaration of Dr. Luis "Tony" Baez, # (9) Exhibit I: Declaration of Ernesto Chacon, # (10) Exhibit J: Declaration of Enrique E. Figueroa, Ph.D., # (11) Exhibit K: Declaration of Jose G. Perez, # (12) Exhibit L: Declaration of Jesus Salas, # (13) Exhibit M: Declaration of Ernesto Villareal, # (14) Exhibit N: Declaration of John Bartkowski)(Earle, Peter)

2:11-cv-00562-JPS-DPW-RMD Notice has been electronically mailed to:

Aaron H Kastens ahkastens@michaelbest.com, mlcrimmins@michaelbest.com

Adam B Stephens astephens@milwaukee.gov

Brady C Williamson bwilliam@gklaw.com, agrote@gklaw.com, jschwartz@gklaw.com

Colleen E Fielkow cfielkow@reinhardtlaw.com, kkempski@reinhardtlaw.com

[STAMP dcecfStamp_ID=1001523647 [Date=4/3/2012] [FileNumber=1866618-1]
[829634445653e9d17173b994fb2871d2297e20ced7d7f135a4d8d64fe71c427f4906
9cd513a9194b98acc189c1d7f77d3d78f0def8918e658a7dfbf4932a224e]]

Document description:Exhibit B: Declaration of Christine Neumann-Ortiz

Original filename:

Electronic document Stamp:

[STAMP dcecfStamp_ID=1001523647 [Date=4/3/2012] [FileNumber=1866618-2]
[3a95fd7293769ffbd73181408e29e15278b5b31b7c43a85c78358dfcac79e895bfa
d17f9da45648300951435c03b1aea948f4e660889b46ca079e0bc84532dd]]

Document description:Exhibit C: Declaration of Maria Monreal-Cameron

Original filename:

Electronic document Stamp:

[STAMP dcecfStamp_ID=1001523647 [Date=4/3/2012] [FileNumber=1866618-3]
[a0b091a9f1869dc7ac777d17cf843ddf4ca42ef3e6b15454fea4a673f23bd91a3633
ea86756236d02e17aecbe96a39990928992d27241b110c38a3f504125a01]]

Document description:Exhibit D: Declaration of Juan Carlos Ruiz

Original filename:

Electronic document Stamp:

[STAMP dcecfStamp_ID=1001523647 [Date=4/3/2012] [FileNumber=1866618-4]
[6eedaaec6fd45ddfb22c878430d60db984f86e48d9e51e016bc422be2f890a50db81
bf05a9485548d289c891d417a6e980d861d9914323afe12d0cb8192aeaac]]

Document description:Exhibit E: Declaration of Victor Huyke

Original filename:

Electronic document Stamp:

[STAMP dcecfStamp_ID=1001523647 [Date=4/3/2012] [FileNumber=1866618-5]
[a8ba1c0dca97f3431e0ffe3150db5ae3128f15b87ba98a4bc81d5cd6b8f022c0e024
829fc3b3a848972870bb47f8c10bad997a9a8a089411826257ff7f64359b]]

Document description:Exhibit F: Declaration of Darryl Morin

Original filename:

Electronic document Stamp:

[STAMP dcecfStamp_ID=1001523647 [Date=4/3/2012] [FileNumber=1866618-6]
[760eb97e3281d33f3ef1e58e3b7e96cd5714e40cbbdf6ea57b5ca86ba46b9cc02baa
574fa9764e5909566f0bf3ce1458c78ddb27dd7e917f1e7a08b5fa9320d7]]

Document description:Exhibit G: Declaration of Steve Fendt

Original filename:

Electronic document Stamp:

[STAMP dcecfStamp_ID=1001523647 [Date=4/3/2012] [FileNumber=1866618-7]
[4d69197955bcd1ac31bd2bb1ff150b13083f8de67eee0396cbe36d545ffe358624c1
5ba0626f855bcd6c0192b1739136bb1cef1843960e43a9c6664e05682840]]

Document description:Exhibit H: Declaration of Dr. Luis "Tony" Baez

Original filename:

Electronic document Stamp:

[STAMP dcecfStamp_ID=1001523647 [Date=4/3/2012] [FileNumber=1866618-8]
[b505e0a705e69a65fa3425375e71e67075f78a1168b3409b2cfd0549566a97453ecc
aca2f3f3b30d637c2f40e555bfa8939b4f695cbe45f97d37d69ecce0e753]]

Document description:Exhibit I: Declaration of Ernesto Chacon

Original filename:

Electronic document Stamp:

[STAMP dcecfStamp_ID=1001523647 [Date=4/3/2012] [FileNumber=1866618-9]
[8e758ff25d2527974923b9bfa90fc625b4045bdfd34e2fdc3b96abf439cf2881cee9
72292a7c764d879336e8143d1eda7b727edd90af597f2e1f6697cfc545f2]]